

1 Debbie Leonard (Nev. Bar #8260)
 2 Leonard Law, P.C.
 3 955 South Virginia Street, Suite 220
 4 Reno, Nevada 89502
 5 (775) 964-4656
 6 debbie@leonardlawpc.com

7 Brandon L. Jensen (*pro hac vice*)
 8 Budd-Falen Law Offices, LLC
 9 300 East 18th Street
 Post Office Box 346
 Cheyenne, Wyoming 82003
 (307) 632-5105
brandon@buddfalen.com

10 *Attorneys for Plaintiffs*

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 BAKER RANCHES, INC., a Nevada)
 14 Corporation; DARWIN C. WHEELER; OWEN)
 15 L. AND PATRICIA T. GONDER; DAVID)
 16 JOHN ELDRIDGE AND RUTH ELDRIDGE,)
 17 as Co-Trustees of the DAVID JOHN)
 18 ELDRIDGE AND RUTH ELDRIDGE FAMILY)
 19 LIVING TRUST, dated January 31, 2007;)
 20 ZANE JORDAN; and JUDEE SCHALEY,)
 21)
 22 Plaintiffs,)
 23)
 24 v.)
 25)
 26 DAVID BERNHARDT, in his official capacity)
 27 as Acting Secretary of the United States)
 28 Department of the Interior, the UNITED)
 1 STATES DEPARTMENT OF THE INTERIOR,)
 2 MICHAEL T. REYNOLDS, in his official)
 3 capacity as Acting Director of the National)
 4 Park Service, the NATIONAL PARK SERVICE,)
 5 and JAMES WOOLSEY, in his official)
 6 capacity as Superintendent of the Great)
 7 Basin National Park,)
 8)
 9 Defendants.)
 10)
 11)
 12)
 13)
 14)
 15)
 16)
 17)
 18)
 19)
 20)
 21)
 22)
 23)
 24)
 25)
 26)
 27)
 28)

Case No. 3:18-cv-00261-RFB-CLB

**STIPULATION TO
 EXTEND DEADLINE TO
 FILE PRETIRAL ORDER
 (First Request)**

1 Pursuant to LR IA 6-1, Plaintiffs, by and through their undersigned counsel Debbie
2 Leonard of Leonard Law, P.C. and Brandon L. Jensen of the Budd-Falen Law Offices, LLC, and
3 Defendants, by and through their undersigned counsel David L. Negri of the United States
4 Department of Justice, stipulate and agree as follows:

5 On September 1, 2022, the Court issued an Order on the parties' motions for summary
6 judgment (ECF No. 57) and ordered the parties to submit a proposed joint pretrial order for a
7 bench trial by September 23, 2022.

8 The parties are currently engaged in settlement discussions.

9 The parties stipulate and agree to extend the deadline to file the joint pretrial order by
10 sixty (60) days, to and including November 22, 2022, to provide time to facilitate their
11 settlement efforts.

12 This is the first stipulation for extension of time related to the joint pretrial order. This
13 stipulation is being submitted at least three days before the September 23, 2022 joint pretrial
14 order deadline as required by the Chambers Practices of the Honorable Richard F. Boulware, II.

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 The parties represent that this stipulation is made in good faith and not for the purpose of
2 delay.

3 RESPECTFULLY SUBMITTED this 19th day of September 2022.

4

5 /s/ Debbie Leonard
6 DEBBIE LEONARD (Nev. Bar #8260)
Leonard Law, P.C.
7 955 South Virginia Street
Suite 220
8 Reno, Nevada 89502
(775) 964-4656
debbie@leonardlegal.com

9

10 BRANDON L. JENSEN (*pro hac vice*)
Budd-Falen Law Offices, LLC
11 300 East 18th Street
Post Office Box 346
12 Cheyenne, Wyoming 82003
(307) 632-5105
brandon@buddfalen.com

13 *Attorneys for Plaintiffs*

14 /s/ David L. Negri
TODD KIM
Assistant Attorney General
United States Department of Justice
DAVID L. NEGRI, Trial Attorney
Environment and Natural Resources Division
U.S. Attorney's Office
800 Park Blvd., #600
Boise, Idaho 83712
(208) 334-1936
david.negri@usdoj.gov

15 JASON M. FRIERSON
United States Attorney, District of Nevada
GREG ADDINGTON
Assistant United States Attorney
400 South Virginia Street, Suite 900
Reno, NV 89501
(775) 784-5438

16 *Attorneys for Defendants*

17 **IT IS SO ORDERED:**

18

19

20

21

22

23

24

25

26

27

28


RICHARD E. BOULWARE, II
United States District Court

DATED this 21st day of September, 2022.